

UPDATE 2005

To: Natural Gas Distribution Operators

From: Glynn Blanton, Chief - Gas Pipeline Safety Division

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Operator Qualification

In 2004, each operator's OQ plan and documentation were inspected using the new federal OQ Protocols. The protocols, developed by the Federal Office of Pipeline Safety (OPS), were not modified in any way by the GPSD staff. Nine elements were addressed, including one for field verification.

It is very important that the operator be able to prove, through documentation, that it has completed each step of the decision-making process outlined in the OQ plan.

Any "potential issues" that were discovered during the 2004 OQ inspection will be addressed in future routine inspections. Adequacy of documentation may also be further assessed. It is very important that the operator be able to prove, through documentation, that each step of the decision-making process outlined in the OQ plan has been completed. The operator must also be able to defend its qualification process as being adequate to fully meet the intent of the OQ Rule. The operator may be asked to demonstrate the effectiveness of its OQ program by performing certain covered tasks in the field. Individuals performing those tasks may be tested to ascertain their knowledge of the task at hand and of related AOCs. They may also be quizzed on their working knowledge of the utility's OQ program. In essence, the operator will be assessed on how well they have incorporated the OQ Rule into their everyday activities.

Protocols Summary

All operators were OQ inspected in 2004. Compilation of data from those inspections shows that the top four protocols identified most often with "potential issues" are:

- 1.04** Training Requirements (Initial Qualification, Remedial, and Reevaluation) -- 80.1%
- 2.02** Evaluation Method(s) (Demonstration of Knowledge, Skill, and Ability) -- 55.6%
- 4.02** Evaluation of Individual's Capability to Recognize and React to AOCs -- 60.3%
- 6.01** Program Performance and Improvement -- 79.5%

Leakage Surveys (Outside Business Districts)

The code requirement has changed slightly to give operators a little more time for conducting leak surveys outside of business districts. §192.723(b)(2) previously dictated that a leak survey be conducted as frequently as necessary, but at intervals not exceeding 5 years for cathodically protected lines and 3 years for unprotected lines. Effective July 14, 2004, the rule changed the time-frame of leakage surveys conducted outside of business districts to at least once every 5 years **not to exceed 63 months** for cathodically protected lines and once every 3 years **not to exceed 39 months** for unprotected lines. (Federal Register/Vol 69, No.174, Page 54593)

Random Drug Testing Rate

Operators are required each year to randomly select and test a certain number of employees for prohibited drugs. The number may not be less than the minimum annual percentage rate as determined by the Federal Office of Pipeline Safety, either 50 or 25 percent of covered employees. In accordance with applicable standards, OPS has determined that the positive rate of random drug tests reported by operators for testing done in CY 2003 is less than 1.0 percent. Therefore, in CY 2005, the minimum annual percentage rate for random drug testing is 25 percent of covered employees. (Effective January 1 through December 31, 2005.)

Blanton Appointed to Technical Pipeline Safety Standards Committee



Glynn Blanton, Chief of the GPSD, was appointed in November 2004 to serve a three-year term on the TPSSC, an advisory committee authorized by the Natural Gas Pipeline Safety Act of 1968. The committee has 15 appointed members with staggering terms and meets several times a year to review and report on proposed federal gas pipeline safety standards submitted by DOT. The review process involves looking closely at technical feasibility, reasonableness, cost effectiveness, and practicability. The committee also serves as a sounding board for discussing pipeline safety policy and legislative issues.

Public Awareness Program - API RP 1162

Public Awareness Programs continue to be a hot topic with gas operators and regulators. As a result of the Pipeline Safety Improvement Act of 2002 (PSIA), gas pipeline operators were required to complete Public Education Self-Assessment forms in 2003 when API RP 1162 was not an adopted standard in 49 CFR, Part 192. On June 24, 2004, the Research and Special Programs Administration issued a notice of proposed rulemaking in the Federal Register regarding Public Education Programs. It proposed to add API RP 1162 to Appendix "A" of CFR 49 Part 192, which lists numerous industry standards that have been incorporated by reference. The notice also proposes to revise §192.616 to require each operator to "develop, implement, and maintain a public education program that complies with standard API RP 1162". At the time of this writing a final rule has not been issued but is anticipated early in 2005.

Questions regarding how to achieve compliance with Public Awareness requirements are plentiful. Lacking a final rule, the only current source of guidance is the API RP 1162 document, which addresses program development, stakeholder audiences, message content, message delivery methods, supplemental enhancements, documentation and record keeping, and program evaluation. It contains suggested language, sample questionnaires, and sample evaluation forms which may be utilized in developing and implementing programs.

You can view, save to your PC (not print), or purchase a hard copy of the document on the API website:
<http://committees.api.org/pipeline/standards/index.html>.

Integrity Management Rule -Transmission Line

Part 192, Subpart O, Sections 901 thru 951 prescribes minimum requirements for an integrity management program on any gas transmission pipeline covered under this part. In general, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline seg-

ment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a time line for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

The integrity management requirements apply to you if you operate a transmission line which requires submittal of an annual form RSPA F7100.2 to the federal Office of Pipeline Safety. The Pipeline Safety Improvement Act of 2002 required operators of such pipelines to begin integrity assessments by **June 17, 2004**. If you have conducted your assessments and identified no High Consequence Areas (HCAs), you are not exempted from the requirement. You must still have a continuing program to identify new HCAs and implement the elements of your integrity management program in those areas.

Per §192.907, transmission pipeline operators with HCAs must have developed and followed a written integrity program no later than **December 17, 2004**. A required program element in §192.945 is the reporting of four performance measures specified in ASME/ANSI B31.8S, Section 9.4. The four performance measures operators must submit are:

1. Number of pipeline miles inspected vs. program requirements.
2. Number of immediate repairs completed as a result of the integrity management inspection program.
3. Number of scheduled repairs completed.
4. Number of leaks, failures, and incidents (classified by cause).

The required information may be reported electronically or by other means on a semi-annual basis in accordance with §192.951.

Performance measures must be completed through June 30 and December 31 of each year and must be submitted within 2 months after those dates (**August 31 & February 28**) to our agency and OPS. Operators were required to submit their first report (June '04) by August 31, 2004. OPS prefers that reports be submitted on-line at the following address: <http://ops.dot.gov>. Our agency does not have the capability for on-line submission. You may choose to mail or fax this information. Our fax number is 615.741.1228.

Did you know???

■ The GPSD uses information you submit on the federal form **RSPA F7100.1-1 (Annual Report)** several times throughout the year. It appears that some of the information is being incorrectly calculated. Be sure to double check all calculations, especially the percent of gas loss equation: **((Gas Bought - Accounted for Gas**

Losses - Gas Sold) ÷ Gas Bought) x 100 = % Gas Loss.

Annual Reports are due to OPS by March 15 and this office by April 1.

■ The ASME B31Q draft document is planned for posting by February 2, 2005 and will be open for public comment. Go to <http://www.asme.org/codes/> to make comments.

Get to Know the GPSD Inspectors....



Brad Williams

Brad has been with the TRA since January 1997. He supervises all of the other engineers while performing his own inspections throughout the year. Brad has bachelor of science degrees in accounting and civil engineering. In his "spare time," Brad purchases, renovates and leases rental properties and likes to travel. (Favorite food - fried catfish)



Eric Cherry

Eric joined the TRA in June 2002 and eased right into the specialized niche of inspecting natural gas facilities. Bringing with him a degree in civil engineering and several years of utilities experience, Eric is at home in the office or the field. Volunteering for various charities and biking are of a couple of Eric's passions. (Favorite food: meat and potatoes and good lasagna)



Tom Woosley

Tom is a Gas Safety old-timer with service since November 1990. He obtained his degree in electrical engineering from Tennessee Technological University. Tom has seen many changes in natural gas regulation through the years and is a constant source of information on the latest regulatory happenings. He is a computer wiz by choice and loves a geek challenge. (Favorite food: all of it!)



Clift Phillips

Clift graced us with his presence in May 2002. He is a biosystems engineer with a lot on the ball. Being the young, energetic fellow that he is, Clift is first out of the gate each year charging into his inspections. He contributes a young intellectual perspective to our staff, which keeps us on our toes (lest we start feeling a little old). Clift spends many of his weekends drumming for a volunteer marching band that travels and competes in the southeast. (Favorite food: macaroni and cheese.)

GIVE A HARDY WELCOME TO THE NEW GUY!



Larry Borum, P.E.

The GPSD welcomed Larry to its staff in August 2004. He received a bachelor of science degree in civil engineering and masters course work in environmental engineering from Tennessee Technological University. Larry's 33 years in the engineering field rounds out the staff's vast array of on-the-job experience! Having already completed his first TSI course and been on the road for the last five months of '04 with the other inspectors, he is now scheduling visits and plans to be meeting with operators this week. Larry's family is his love (he has a wife and two daughters) and his two (yes you heard right, two) Firebirds, a 1976 and a 1997 model, are his favorite fun things to spend time on, when he is not bowling. (Favorite food: pizza)

GAS PIPELINE SAFETY DIVISION EMERGENCY CONTACT INFORMATION

Office 800.342.8359 or 615.741.2844

Fax 615.741.1228

(Washington D.C. Response Center 800.424.8802)

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2005 Operator/Inspector List

Private

Atmos Energy
 Bristol- Phillips
 Columbia- Woosley
 Franklin- Borum
 Greeneville- Cherry
 Johnson City- Cherry
 Kingsport- Phillips
 Maryville- Williams
 Morristown- Williams
 Murfreesboro- Phillips
 Shelbyville- Woosley
 Union City- Phillips
 Chattanooga- Woosley
 Chattanooga^(Clev)- Woosley
 Counce- Phillips
 GASCO^(Jellico)- Williams
 GASCO^(Byrdstown)- Borum
 Hartsville- Cherry
 Nashville Gas- Borum
 Red Boiling Sprs.- Borum

Municipal

Adamsville- Williams
 Athens- Cherry
 Athens^(Ardmore)- Williams
 Bells- Cherry
 Bolivar- Williams
 Brownsville- Phillips
 Centerville- Cherry
 Clarksville- Woosley
 Clifton- Borum
 Collinwood- Phillips
 Cookeville- Williams
 Covington- Phillips
 Dickson- Cherry
 Dunlap- Cherry
 Dyersburg- Woosley
 Englewood- Borum
 Etowah- Cherry
 Fayetteville- Borum
 Ft. Campbell- Woosley
 Friendship- Borum
 Gainesboro- Woosley
 Gallatin- Borum
 Gallaway- Cherry
 Halls- Williams
 Harriman- Phillips
 Henderson- Williams
 Henning- Williams
 Hohenwald- Williams
 Humboldt- Borum
 Jackson- Cherry
 Jamestown- Phillips

Knoxville- Cherry
 Lafayette- Borum
 Lawrenceburg- Cherry
 Lebanon- Phillips
 Lenoir City- Borum
 Lewisburg- Borum
 Lexington- Phillips
 Linden- Woosley
 Livingston- Williams
 Lobelville- Phillips
 Loretto- Borum
 Loudon- Woosley
 Madisonville- Phillips
 Marion- Phillips
 Martin- Borum
 Mason- Woosley
 Maury City- Borum
 Memphis- Cherry
 Monteagle- Woosley
 Mt. Pleasant- Borum
 Munford- Williams
 Newbern- Borum
 Obion- Woosley
 Parsons- Williams
 Pikeville- Phillips
 Portland- Williams
 Pulaski- Phillips
 Ridgetop- Woosley
 Ripley- Woosley
 Rockwood- Cherry
 Savannah- Phillips
 Selmer- Williams
 Smyrna- Williams
 Somerville- Cherry
 South Fulton- Cherry
 Springfield- Woosley
 St. Joseph- Cherry
 Sweetwater- Woosley
 Trimble- Woosley
 Troy- Phillips
 Waynesboro- Williams

Utility District

Bedford County- Borum
 Citizens Gas- Phillips
 Claiborne County- Borum
 Clay Gas- Cherry
 Crockett Public- Williams
 Elk River Public- Phillips
 Gibson County- Phillips
 Hardeman/Fayette- Borum
 Hawkins County- Williams
 Horton Highway- Cherry
 Humphreys Co.- Woosley
 Jefferson/Cocke- Borum

Lake County- Cherry
 Middle Tennessee Gas
 Crossville- Phillips
 Dayton- Williams
 McMinnville- Williams
 Smithville- Williams
 Sparta- Woosley
 Oak Ridge- Woosley
 Paris/Henry Co.- Cherry
 Poplar Grove- Borum
 Powell/Clinch- Williams
 Powell Valley- Phillips
 Sevier County- Woosley
 Tipton Co., First- Woosley
 Unicoi County- Borum
 Upper Cumb.- Cherry
 West TN Public- Woosley

Housing Authority

Columbia- Phillips
 Covington- Phillips
 Gallatin- Phillips
 Harriman- Williams
 Hartsville- Woosley
 Huntingdon- Borum
 Jackson- Cherry
 Jefferson City- Williams
 Johnson City- Phillips
 Kingsport- Cherry
 Lawrenceburg- Phillips
 Lebanon- Borum
 Livingston- Cherry
 Martin- Williams
 McKenzie- Cherry
 Memphis- Woosley
 Metro Dev/Hous.- Woosley
 Murfreesboro- Woosley
 Parsons/Decatur- Borum
 Portland- Phillips
 Pulaski- Williams
 South Pittsburg- Borum
 Trenton- Cherry
 Tullahoma- Woosley
 Union City- Borum
 Waverly- Williams

Apartment

Alexian Village- Cherry
 Avalon West- Williams
 Georgetown- Phillips
 Green Hills Terr.- Borum
 Kirby Pines Est.- Woosley
 Maple Village- Phillips
 Pentad^(Crestview)- Borum

Pentad^(Hill & Pkwy)- Williams
 Ravenscroft- Woosley
 Rose Garden- Cherry
 Shepherd Hills- Phillips

Mobile Home Park

Fern Creek- Cherry
 Creekside- Williams
 Old Trinity- Woosley
 Stephens Park- Borum

Intrastate Pipeline

Clear Creek- Woosley
 Coalfield- Williams
 COPCO- Woosley
 Evan Energy- Borum
 Fentress Gas- Phillips
 TENGASCO- Phillips
 Titan- Cherry

Direct Sale

AcuPowder- Cherry
 AFG^(Church Hill)- Woosley
 AFG^(Kingsport)- Williams
 AOC- Williams
 ALCOA- Borum
 Bowater- Williams
 Dept. of Energy- Williams
 Eastman Chem.- Woosley
 General Shale- Cherry
 Holston^(Kingsport)- Borum
 Holston^(Mt. Carmel)- Phillips
 MD Recycling- Phillips
 Occidental Chem.- Cherry
 Olin Corporation- Williams
 Smelter- Woosley
 Solutia- Woosley
 Tenneco Pkg.- Phillips
 TN Air Ntl. Gd.- Woosley
 TVA^(Gallatin)- Cherry
 TVA^(New J'ville)- Borum
 TVA^(Lagoon Crk)- Borum
 Turney Center- Cherry
 UCAR- Phillips
 Weyerhaeuser- Borum

LNG

Nashville- Borum
 Memphis^(Art.)- Cherry
 Memphis^(Caple.)- Williams